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December 23, 2013

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, SW Washington, DC 20554

Via Electronic Filing

Re: MB Docket No. 13-189, Gannett-Belo Transaction MB Docket No. 09-182, 2010 Quadrennial Review

Dear Ms. Dortch,

On Thursday, December 19, 2013, I spoke by telephone with Gigi B. Sohn, Special Counsel for External Affairs to Chairman Wheeler, to discuss issues in the above-captioned dockets.

During the call, I reiterated Free Press's opposition to the transfer of certain licenses from Belo to Gannett and to various Gannett "sidecar" companies used to evade the Commission's local ownership limits. I referred to points set forth in an *ex parte* notice filed December 19th in the Gannett-Belo docket by the Institute for Public Representation, on behalf of joint petitioners Free Press, NABET-CWA, TNG-CWA, NHMC, Common Cause, and UCC's OC Inc.¹

In sum, I suggested that whatever the substance of any initial decision on this transaction, the full Commission should clarify its rules to prevent these kinds of evasions, and also scrutinize the particular license transfers and financial arrangements proposed by Gannett here.

Respectfully submitted,

/s/ Matthew F. Wood

Policy Director Free Press mwood@freepress.net

cc: Gigi B. Sohn

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¹ See Institute for Public Representation Notice of *Ex Parte* Communication, MB Docket No. 13-189 (filed Dec. 19, 2013), *available at* http://apps.fcc.gov/ecfs/document/view?id=7520963836 (and attached hereto).